

**TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.**

ATTORNEYS AT LAW

40 EXCHANGE PLACE

18TH FLOOR

NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE

(212) 482-1303 FAX

WWW.TALKINLAW.COM

EMAIL: INFO@TALKINLAW.COM

**MARYLAND OFFICE:**  
5100 DORSEY HALL DRIVE  
SUITE 100  
ELLIOTT CITY, MD 21042

410-964-0300

**NEW JERSEY OFFICE:**  
2500 PLAZA 5  
HARBORSIDE FINANCIAL CENTER  
JERSEY CITY, NJ 07311

201-342-6665

May 14, 2025

Honorable Margo K. Brodie  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

BY ECF & EMAIL

Re: United States v. Michael Hlday  
20 Cr. 008 (MKB)

Dear Judge Brodie:

Defendant Michael Hlday (“Hlday”) is currently at liberty on a bond that contains numerous conditions including travel restrictions. Hlday’s mother recently had surgery and needs some assistance at her home. Additionally, Hlday’s daughter is graduating from college and he wants to take his mother to the graduation. For these reasons, Hlday respectfully requests permission to travel to New York and to stay with mother on Long Island from May 17, 2025 through May 20, 2025. On May 18, 2025, Hlday also requests permission to travel to Rhode Island with his mother for the day to attend his daughter’s graduation ceremony in Rhode Island. The government, by Assistant United States Attorney Jonathan Lax, and Pretrial, by Pretrial Officer Valeria Lopez consent to these applications.

Thank you for Your Honor’s consideration of these requests.

Very truly yours,  
*Sanford Talkin*  
Sanford Talkin

cc: AUSA Jonathan Lax (by ECF & email)  
EDNY Pretrial EM Unit (by email)  
USPO Jason Roberts (by email)